

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Case No.

Plaintiff,

v.

Donald J. TRUMP, in his official capacity, President of the United States of America;

John TSOUKARIS, in his official capacity as ICE Enforcement and Removal Operations New Jersey Field Office Director;

Todd M. LYONS, in his official capacity, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security; and

Kristi NOEM, in her official capacity, Secretary, U.S. Department of Homeland Security;

Defendants.

NOTICE TO COURT OF CONFLICT WITH SCHEDULED PRELIMINARY INJUNCTION HEARING AND REQUEST FOR ALTERNATE DATE

Pursuant to this Court's April 18th Order (ECF 13), Plaintiff notifies the court that both local counsel and pro hac vice counsel have a pre-existing conflict on the date of the proposed preliminary hearing. Pro Hac Vice counsel will be speaking in Zagreb, Croatia at the Rome District Chapter of the American Immigration Lawyers Association on the same day and then

taking a week vacation after the speaking engagement. Pro hac vice counsel returns to the country on the 14th of May and then must leave on the 15th of May to pick up his daughter from college. As a result, pro hac vice counsel is not available between May 5th and May 17th, but would be available before or after that date.

Additionally, if possible, local counsel has his daughter on Mondays and Tuesdays, so those days are hard for him to find childcare, and if we can schedule on days other than Monday or Tuesday, that would be most convenient for local counsel.

Plaintiff has not had the opportunity to confer with counsel for the Defendants on this motion.

Dated: April 18, 2025

Respectfully submitted,
/s/ Jeff Joseph
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